

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**THE HANOVER INSURANCE COMPANY,** §  
*Plaintiff,* §

**V.** §

**K&S GROUP, INC., KEYSTONE  
SOUTHWEST INSURANCE AGENCY,  
INC., AND JAMES LEEKER,** §  
*Defendants.* §

**CASE NO. 3:25-CV-00027-N**

**JURY TRIAL DEMANDED**

**PLAINTIFF'S NOTICE TO COURT OF SETTLEMENT**

TO THE HONORABLE U.S. DISTRICT JUDGE DAVID C. GODBEY:

Plaintiff, The Hanover Insurance Company, hereby provides notice to the Court that it has agreed to settle all matters in dispute with regard to this lawsuit. Plaintiff and Defendants are in the process of preparing and executing dismissal documents.

Respectfully submitted,

**PHELPS DUNBAR LLP**

BY: /s/ Peri H. Alkas

Peri H. Alkas  
ATTORNEY-IN-CHARGE  
State Bar No. 00783536  
Federal Bar No. 15785  
ONE SHELL PLAZA  
910 Louisiana Street; Suite 4300  
Houston, Texas 77002  
Telephone: 713 626 1386  
Facsimile: 713 626 1388  
Email: [peri.alkas@phelps.com](mailto:peri.alkas@phelps.com)

AND

BY: /s/ Sondra Sylva  
Sondra Sylva; TBN: 24033017  
PHELPS DUNBAR LLP  
2102 E. State Highway 114, Suite 207  
Southlake, Texas 76092  
Telephone: (817) 488-3134  
Facsimile: (817) 488-3214  
Email: [sondra.sylva@phelps.com](mailto:sondra.sylva@phelps.com)

**ATTORNEYS FOR DEFENDANT,  
THE HANOVER INSURANCE COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served upon all known counsel of record as listed below on March 26, 2025.

Robert A. Bragalone  
B. Ryan Fellman  
GORDON & REES  
2200 Ross Avenue, Suite 3700  
Dallas, Texas 75201

[BBragalone@grsm.com](mailto:BBragalone@grsm.com)  
[RFellman@grsm.com](mailto:RFellman@grsm.com)

/s/ Peri H. Alkas  
Peri H. Alkas